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12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 United States of America,
15 Plaintiff
16 v.
17 Robert Chavez,
18 Defendant

Case No. 2:23-cr-00067-CDS-DJA

**Stipulation and Order to
Continue Status Report
Deadline**

19 The parties stipulate to continue the status report deadline (currently August
20 12, 2024) for a period of 30 days to allow time for defense counsel to confirm whether
21 Mr. Chavez has completed his pretrial diversion requirements. This stipulation is
22 supported by the following facts:

- 23 1. The government filed a criminal information on March 31, 2023,
24 charging Mr. Chavez with Operating a Motor Vehicle in a Reckless
25 Manner (43 C.F.R. § 8341.1(f)(1)) and Driving without Valid Driver's
26 License (43 C.F.R. § 8341.1(d); NRS § 483.550(1)). (ECF No. 1.)
27

2. Mr. Chavez made an initial appearance (at liberty) on April 24, 2023. (ECF No. 4.) He was not detained or placed under supervision. (*Id.*)

3. Mr. Chavez entered a pretrial diversion agreement on February 13, 2024. (ECF No. 30.) He appeared remotely by video teleconference. (*Id.*) Mr. Chavez was placed on pretrial diversion for a period of six months with conditions: (1) complete 60 hours of community service; (2) complete a DUI course and victim impact panel; (3) complete an eight-hour online drug awareness course; and (4) refrain from adverse contact with law enforcement. (*Id.*)

4. The Court set a deadline of August 12, 2024, for the government to file a motion to dismiss or for the parties to file a status report.

5. Counsel for the defendant requires additional time to confirm whether Mr. Chavez has completed his pretrial diversion requirements.

6. The government has no objection to the defense's request.

Accordingly, the parties stipulate to continue the status report deadline (currently August 12, 2024) for a period of 30 days to September 11, 2024.

Dated August 8, 2024.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Rick Mula

By /s/ Skyler Pearson

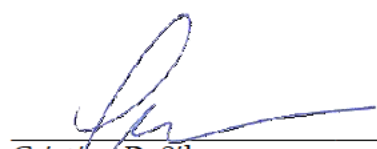
Rick Mula
Assistant Federal Public Defender

Skyler Pearson
Assistant United States Attorney

Order

Good cause appearing, it is hereby ordered, nunc pro tunc, that the deadline for the government to file a motion to dismiss, or for the parties to file a status report, is extended by 30 days to September 11, 2024.

Dated: August 13, 2024


Cristina D. Silva
United States District Judge